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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
RENATO MENDOZA MEDINA, )  
a/k/a Rene Mendoza Medina, )  
PHYLLIS REYES CUISON, )  
a/k/a Phyllis Cundangan Reyes, and )  
RAWLIN CUNDANGAN REYES, )  
 )  
Defendants. )  
\_\_\_\_\_ )

No. CR 06-0144 JSW

**STIPULATION AND  
[PROPOSED] PROTECTIVE ORDER**

STIPULATION

The United States and the defendants in this action, through undersigned counsel, hereby stipulate and agree as follows:

1. The United States is prepared to produce to each defendant's counsel of record in this matter discovery containing sensitive tax, personal and/or financial information of third parties, subject to the following conditions.

2. No defense counsel of record shall disclose any documents or information produced by the United States to anyone except his or her client, any defense witnesses, experts or investigators retained in this case, or any defense staff working on the case, and no defendant, defense witnesses, experts or investigators, or defense staff shall disclose such documents or

1 information to anyone, absent further order of the Court.

2 3. The documents and information described in paragraph 1 shall be used only to  
3 prepare and evaluate the defense in this proceeding. Any person to whom the documents or  
4 information are disclosed must be provided with a copy of this Stipulation and Order. The  
5 materials provided to defense counsel pursuant to this order, and any copies thereof, shall be  
6 returned to the government at the conclusion of this case.

7 4. The documents described above shall not be copied at all unless copying is  
8 necessary for preparation of the defense in this proceeding. Any copy of the materials that is  
9 made shall be accompanied at all times by a copy of this Stipulation and Order. No document or  
10 copy thereof shall be left with any defense witness.

11  
12 DATED: 3/23/06

/S/ Christina Hua  
CHRISTINA HUA  
Assistant United States Attorney

13  
14 DATED: 3/23/06

/S/ Cristina C. Arguedas  
CRISTINA C. ARGUEDAS  
Counsel for Renato Mendoza Medina

15  
16  
17 DATED: 3/23/06

/S/ Lidia Stiglich  
LIDIA STIGLICH  
Counsel for Rawlin Cundangan Reyes

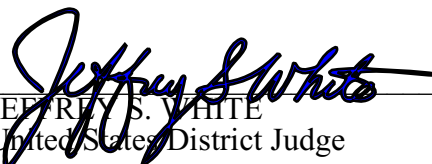
18  
19 DATED: 3/23/06

/S/ Ann Moorman  
ANN MOORMAN  
Counsel for Phyllis Reyes Cuison

20  
21  
22 ORDER

23 In light of the stipulation and agreement of the parties to this action, and good cause  
24 appearing therefor, it is HEREBY ORDERED that disclosure of the above-described information  
25 shall be restricted as set forth in Paragraphs 1 through 4 above.

26  
27  
28 DATED: March 27, 2006

  
JEFFREY S. WHITE  
United States District Judge